

U.S. Department of Justice

United States Attorney Eastern District of New York

AAS/RMP/AS/ADR F. #2021R00600

271 Cadman Plaza East Brooklyn, New York 11201

October 31, 2025

By Email and ECF

Kenneth Abell Jarrod L. Schaeffer Abell Eskew Landau LLP 256 Fifth Avenue, 5th Floor New York, NY 10001

Seth DuCharme Nicole Boeckmann Bracewell LLP 31 W. 52nd Street, Suite 1900 New York, NY, 10019-6118

Re: United States v. Sun, et. al.

Criminal Docket No. 24-CR-346 (BMC)

Dear Counsel:

This letter will be accompanied by a link to the secure download of certain discovery materials produced pursuant to Rule 16 of the Federal Rules of Criminal Procedure. The government renews its request for reciprocal discovery from the defendants.

The following documents were recently obtained by the government during the course of the investigation or recently authorized for production:

Bates No.	Description of Item
EDNY_153336-EDNY_153338	NYS Commission on Ethics and Lobbying in
	Government Records

You may examine the physical evidence discoverable under Rule 16, including original documents and items, by calling us to arrange a mutually convenient time.

Very truly yours,

JOSEPH NOCELLA, JR. United States Attorney Eastern District of New York

/s/ Alexander A. Solomon By: Alexander A. Solomon Robert M. Pollack Amanda Shami Andrew D. Reich Assistant U.S. Attorneys (718) 254-7000